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5 Attorney for Defendant

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
8 **-oOo-**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 TAJ THOMPSON,

13 Defendant.

Case No. 2:16-cr-230-GMN-DJA

STIPULATION TO CONTINUE
SENTENCING
(Third Request)

14 IT IS HEREBY STIPULATED AND AGREED by and between the United States
15 of America, through Shaheen Torgoley, Esq., Assistant United States Attorney, together
16 with Daniel Hill, Esq., counsel for defendant Taj Thompson, that the sentencing hearing
17 currently scheduled for September 23, 2020 at 11:00 a.m. be vacated and set to a date
18 and time convenient to this Court approximately 30 days from the current sentencing
19 date.

20 This stipulation is entered into for the following reasons:

- 21 1. The Defendant is out of custody and does not object to the continuance.
- 22 2. The parties mistakenly anticipated that their joint status report (ECF No.
- 23 383) would result in a continuance of the sentencing hearing. Counsel for Mr.
- 24 Thompson announced ready on a State jury trial (Nevada v. Kristopher

Peters, Eighth Judicial District Court case number C-19-345575-1). Jury selection on that case will begin Monday, September 21, 2020 at 9:00 a.m. and trial will last the week.

3. Counsel for Mr. Thompson will be seeking a variance in this case. Owing to trial preparation in State v. Kristopher Peters, he will be unable to complete and file a timely sentencing memorandum.
4. The parties agree to the continuance.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. The additional time requested by this Stipulation is made in good faith and not for purposes of delay.
7. This is the third request for a continuance of the sentencing hearing.

DATED this 17th day of September 2020.

/s/ Daniel Hill

Daniel Hill, Esq.
Counsel for Taj Thompson

/s/ Shaheen Torgoley

Shaheen Torgoley, Esq.
Counsel for the United States

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

2:16-cr-230-GMN-DJA

Plaintiff,

ORDER

vs.

TAJ THOMPSON,

Defendant.

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that sentencing in the above-captioned matter currently scheduled for September 23, 2020 at 11:00 a.m., be vacated and continued to October 28, 2020 at 10:00 a.m..

IT IS FURTHER ORDERED that this is a firm sentencing date and no further continuances will be granted without a hearing to demonstrate a sufficient basis for delay.

DATED 18 day of September, 2020.



THE HONORABLE GLORIA M. NAVARRO
U.S. DISTRICT COURT JUDGE